

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AHMED ASHOUR, JOY BROWN, and CRYSTAL TOWNES, individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

ARIZONA BEVERAGES USA LLC, HORNELL BREWING CO., INC., BEVERAGE MARKETING USA, INC., ARIZONA BEVERAGES HOLDINGS LLC, and ARIZONA BEVERAGES HOLDINGS 2 LLC,

Defendants.

CASE NO. 1:19-cv-07081-(AT) (OTW)

**JOINT LIST OF DOCUMENTS REQUESTED TO BE FILED UNDER SEAL**

Pursuant to the Court's Order requesting that the Parties shall jointly provide a list of all documents they seek to seal (with citations to the ECF docket), which Party requests sealing, and whether the opposing Party objects by May 14, 2024 (ECF No. 335), the Parties jointly submit the following:<sup>1</sup>

NAME OF DOCUMENT	ECF NO. (UNDER SEAL)	ECF NO. (PUBLIC/ REDACTED/ PLACE-HOLDER)	PARTY REQUESTING SEAL	WHETHER OPPOSING PARTY OBJECTS
Defendants' Brief in Support of Motion for Summary Judgment	317	313-23	Defendants.	Plaintiffs do not object to Defendants' redactions.
Defendants' Rule 56.1 Statement	317-1	313-24	Defendants.	Plaintiffs do not object to Defendants' redactions.

<sup>1</sup> The Parties will submit proposed redactions in the event the Court so directs and under seal if necessary.

NAME OF DOCUMENT	ECF NO. (UNDER SEAL)	ECF NO. (PUBLIC/ REDACTED/ PLACE-HOLDER)	PARTY REQUESTING SEAL	WHETHER OPPOSING PARTY OBJECTS
Notice of Motion and Motion for Summary Judgment	314	N/A	N/A; Defendants withdraw request.	Plaintiffs object to any redactions or sealing.
Proposed Order	314-1	N/A	N/A; Defendants withdraw request.	Plaintiffs object to any redactions or sealing.
Deposition Transcript of Ahmed Ashour	315-1	313-1	Plaintiffs request redaction of Ahmed Ashour's private information.	Defendants do not object.
Deposition Transcript of Crystal Townes	315-2	313-2	Plaintiffs request redaction of Crystal Townes' private information.	Defendants do not object.
Deposition Transcript of Joy Brown	315-3	313-3	Plaintiffs request redaction of Joy Brown's private information.	Defendants do not object.
Retainer Agreement of Joy Brown	315-4	313-4	Plaintiffs request seal as it contains sensitive financial information of Joy Brown.	Defendants do not object.
Retainer Agreement of Crystal Townes	315-5	313-5	Plaintiffs request seal as it contains sensitive financial information of Crystal Townes.	Defendants do not object.
Don Vultaggio's 30(b)(6) Deposition Transcript	315-20	313-20	Defendants request to seal proposed redactions.	Plaintiffs object to sealing of document and further object to Defendants' proposed redactions.
Deposition Exhibit P-10	315-21	313-21	Defendants.	Plaintiffs object.
Ex. A to the Don Vultaggio Declaration – Invoices	316-1	312-1	Defendants.	Plaintiffs do not object.

NAME OF DOCUMENT	ECF NO. (UNDER SEAL)	ECF NO. (PUBLIC/ REDACTED/ PLACE-HOLDER)	PARTY REQUESTING SEAL	WHETHER OPPOSING PARTY OBJECTS
Supplemental Donovan Declaration	320	N/A	N/A; Defendants withdraw request.	Plaintiffs object to any redactions or sealing.
Exhibit 1 - Errata Sheet to Brown Deposition Transcript	320-1	N/A	N/A; Defendants withdraw request.	Plaintiffs object to any redactions or sealing.
Second Supplemental Donovan Declaration	321	N/A	N/A; Defendants withdraw request.	Plaintiffs object to any redactions or sealing.
Exhibit A – Signature Page	321-1	N/A	N/A; Defendants withdraw request.	Plaintiffs object to any redactions or sealing.
Plaintiffs' Response to Defendants' Rule 56.1 Statement	328	N/A	Defendants. <sup>2</sup>	Plaintiffs object and request to seal redactions.
Plaintiffs' Memorandum in Opposition to Defendants' Motion for Summary Judgment	330	329	Defendants. <sup>3</sup>	Plaintiffs object and request to seal redactions in accordance with ECF No. 329.
Plaintiff's Supplemental Responses and Objections to Defendants' Initial Interrogatories to Plaintiff Ahmed Ashour, dated Aug. 24, 2020	333-1	332-1	Plaintiffs request redaction of Plaintiff Ashour's private information at Answer to Interrogatory No. 19 in accordance with ECF No. 332-1.	Defendants do not object.

<sup>2</sup> Plaintiffs filed their Response to Defendants' Rule 56.1 Statement under seal in accordance with the protective order, Defendants' objections, and out of an overabundance of caution. Plaintiffs do not believe the document should be sealed in its entirety, but should be redacted.

<sup>3</sup> Plaintiffs filed their Memorandum in Opposition to Defendants' Motion for Summary Judgment under seal in accordance with the protective order, Defendants' objections, and out of an overabundance of caution. Plaintiffs do not believe the document should be sealed in its entirety, but should be redacted.

NAME OF DOCUMENT	ECF NO. (UNDER SEAL)	ECF NO. (PUBLIC/ REDACTED/ PLACE-HOLDER)	PARTY REQUESTING SEAL	WHETHER OPPOSING PARTY OBJECTS
D-IRI-0001	333-2	332-2	Plaintiffs.	Defendants do not object.
Plaintiff's Amended Responses and Objections to Defendants' Initial Interrogatories to Plaintiff Joy Brown, dated Oct. 27, 2021	333-3	332-4	Plaintiffs request redaction of Plaintiff Brown's private information at Answer to Interrogatory No. 15.	Defendants do not object.
KNOUSE001722	333-4	332-5	Defendants.	Plaintiffs object.
DESI063305-10	333-5	332-6	Defendants.	Plaintiffs object.
DESI017298-308	333-6	332-7	Defendants.	Plaintiffs object.
AFI 0000704-5; 597-8	333-7	332-8	Defendants.	Plaintiffs object.
NIAGARA000261-64; 543-7	333-8	332-9	Defendants.	Plaintiffs object.
Defendants' Rule 26(a)(1) Initial Disclosures, dated May 13, 2020	333-9	332-10	Defendants withdraw request.	Plaintiffs object to any redactions or sealing.
Defendants' Rule 26(a)(1) Initial Disclosures, dated June 9, 2020	333-10	332-11	Defendants request to seal proposed redactions.	Plaintiffs object to sealing of document and further object to Defendants' proposed redactions.
DESI038104	333-11	332-12	Plaintiffs.	Defendants do not object.
DESI013465-6	333-12	332-13	Plaintiffs.	Defendants do not object.
DESI011245-9; DESI013467	333-13	332-14	Plaintiffs.	Defendants do not object.
DESI013639	333-14	332-15	Plaintiffs.	Defendants do not object.
DESI013841; DESI014006	333-15	332-16	Plaintiffs.	Defendants do not object.
Defendants' Objections and Responses to Plaintiff Ashour's	333-16	332-17	Defendants request to seal proposed redactions.	Plaintiffs object.

NAME OF DOCUMENT	ECF NO. (UNDER SEAL)	ECF NO. (PUBLIC/ REDACTED/ PLACE-HOLDER)	PARTY REQUESTING SEAL	WHETHER OPPOSING PARTY OBJECTS
First Set of Interrogatories, dated July 30, 2020				
Defendants' Supplemental and Superseding Objections and Responses to Questions Numbers 1 and 5 of Plaintiff Ashour's First Set of Interrogatories, dated February 8, 2021	333-17	332-18	Defendants request to seal proposed redactions.	Plaintiffs object.
Defendants' Amended Objections and Responses to Plaintiff Crystal Townes' Second Set of Interrogatories, dated July 7, 2023	333-18	332-21	Defendants request to seal proposed redactions.	Plaintiffs object.
Defendants' Objections and Responses to Plaintiff Joy Brown's Interrogatories, dated November 3, 2023	333-19	332-22	Defendants request to seal proposed redactions.	Plaintiffs object.
Defendants' Objections and Responses to Plaintiffs' Requests for Admissions, Set I, dated September 22, 2023	333-20	332-23	Defendants request to seal proposed redactions.	Plaintiffs object.
Defendants' Objections and Responses to	333-21	332-24	Defendants request to seal proposed redactions.	Plaintiffs object.

NAME OF DOCUMENT	ECF NO. (UNDER SEAL)	ECF NO. (PUBLIC/ REDACTED/ PLACE-HOLDER)	PARTY REQUESTING SEAL	WHETHER OPPOSING PARTY OBJECTS
Plaintiff Ashour's First Request for Production of Documents, dated July 31, 2020				
Defendants' First Supplemental Objections and Responses to Plaintiff Ashour's First Request for Production of Documents Request Numbers 7-10, 13, 15, 17-20, 23, 25-30, 32, 34 and 35, dated November 6, 2020	333-22	332-25	Defendants request to seal proposed redactions.	Plaintiffs object.
DESI018863-5	333-23	332-27	Defendants.	Plaintiffs object.
DESI061511	333-24	332-28	Defendants.	Plaintiffs object.
Defendants' Reply Memorandum of Law in Support of Motion for Summary Judgment	343	342	Defendants request to seal redactions in accordance with ECF No. 342.	Plaintiffs object to sealing of document and further object to Defendants' proposed redactions.

Dated: May 14, 2024

*/s/ Melissa S. Weiner*

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